# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

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) No. 3:14-cv-00223 ) District Judge Pamela L. Reeves
) Magistrate Judge H. Bruce Guyton
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### **STIPULATION**

The parties, by and through undersigned counsel, provide the following stipulation as to the maximum amount of damages plaintiff is seeking and will ever seek in the pending action filed against defendant. The parties stipulate that plaintiff at no time will seek any more than \$74,999.99 in this lawsuit, and specifically no more than the following:

- 1. \$43,174.00 for damage to property and structure allegedly covered under insurance policy;
  - 2. Lost income not to exceed \$20,000.00;
  - 3. No more than \$7,500.00 in attorneys' fees and costs.

Plaintiff specifically agrees it will not amend any pleading to seek additional damages other than or greater than those referenced in this stipulation exclusive of interest and costs.

Respectfully submitted,

### s/ E. Jason Ferrell\_

### **PARKS T. CHASTAIN**

Registration No. 13744

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Attorneys for Defendant, State Automobile Mutual Insurance Company, incorrectly sued as State Auto Insurance Companies

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# C. EDWARD DANIEL

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#### THE DANIEL LAW FIRM

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# **CERTIFICATE OF SERVICE**

I hereby certify that on this 29th day of July, 2014, a true and correct copy of the foregoing has been sent, via first-class mail, postage prepaid to:

C. Edward Daniel, Esquire The Daniel Law Firm 4608 Papermill Drive Knoxville, TN 37909

s/ E. Jason Ferrell\_

**E. JASON FERRELL** 

EJF:dmt